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Transcript of Michael Russin

January 16, 2023

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1 is that right?

2 A I believe so.

3 Q Okay. Is it 10 percent every year?

4 A Yes.

5 Q And then after 10 years, you're 100
6 percent vested?

7 A Correct.

8 Q So how many years did you work at AIL?

9 A Nine.

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25 MR. WEBB: Yeah. Amy, just to the extent

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1 we're going to talk about the separation -- any
2 separation agreement, like I indicated in my
3 discovery responses, I would just ask that you
4 guys sign a protective order -- stipulation for a
5 motion for protective order on that.

6 MS. WILLIAMSON: Okay. Do you want to do
7 that now?

8 MR. WEBB: I mean, we can. I was going
9 to -- I signed the one that Gene sent over. I
10 mean, it's going to have the same terms as that
11 one. So, I mean, if you want me to --

12 THE WITNESS: Can I use the restroom real
13 quick while you guys do that?

14 MS. WILLIAMSON: Yeah. Sure. We don't --
15 I think -- nothing is pending, right? There's not
16 a question pending.

17 (Recess.)

18 BY MS. WILLIAMSON:

19 Q Okay. I am going to jump back a minute
20 here. Do you have any Snapchat accounts?

21 A Yes, yes. I do have a Snapchat account.

22 Q I don't know what the right lingo is.

23 What's the profile name or account name?

24 A I think it's something ridiculous that I
25 made like 10 years ago. It's Tree Table Chair,

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1 agency --

2 Q Okay. So you --

3 A -- get leads, and don't talk to her.

4 Q Okay.

5 A I said okay.

6 Q So where -- what was your understanding of
7 where -- who she would be coded to at that point?

8 A The agency.

9 Q Excuse me. I thought it had to be some
10 individual.

11 A No. You could be coded to the agency,
12 like, just a floater under Simon.

13 Q I see. Okay, okay. And then did you talk
14 to Simon about the incident going forward?

15 A No.

16 Q Not at all?

17 A Not until he flew to Portland the day that
18 I parted ways with AIL.

19 Q Okay. You never had any further
20 conversations with him about it?

21 A Not that I can recall.

22 Q Okay. How about with Natalie Price?

23 A Yes. She sent me over an incident report
24 to sign, which I did not sign because it was BS.

25 Q Did you produce that to your attorneys?

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1 A I don't have access to it anymore. They
2 wiped my Arias account. That's where it was.

3 Q When you say it was BS, why do you say
4 that?

5 A Well, the message that she produced wasn't
6 what was said. So the incident report was worded
7 in such a way, Hey, I did this. I regret my
8 actions. I understand the disciplinary action
9 being taken against me. Sign here. And I said I
10 didn't say that, so I'm not signing this.

11 Q Okay. Did Natalie -- strike that.

12 Is Natalie Price the Natalie D'Achille the
13 same person?

14 A Yes.

15 Q Okay. Did she -- did Natalie ask for a
16 statement from you about the -- about what Renee
17 reported?

18 A Yes. I believe so.

19 Q Okay. Was that something that was
20 recorded?

21 A I think I typed something up and sent it
22 over.

23 Q Okay. Do you still have that?

24 A Like I said, they wiped my e-mail in
25 February. So that's all --

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1 Q Okay. I didn't know if you saved it to,
2 like, a personal account or anything.

3 A I honestly didn't realize it was going to
4 come to this.

5 Q Right.

6 A I never saw Renee doing this ever in a
7 million years, ever. It wasn't even a concern to
8 me. I thought she was just mad because I kicked
9 her off -- removed her from me working with her.

10 Q Okay.

11 A I thought she was just mad, you know.
12 This was her way of getting back at me. I had no
13 reason to save anything.

14 Q Gotcha. Did Natalie ask you for any --
15 any documents or information other than the
16 statement?

17 A No.

18 Q Did anybody else at Arias ask you for
19 additional information?

20 A No.

21 Q Did Natalie contact anybody else at Arias
22 about the incident?

23 A Not to my knowledge.

24 Q Okay. How did you communicate back to
25 Natalie that you thought the incident report was